

DANIEL G. BOGDEN
United States Attorney
PHILLIP N. SMITH, JR.
Assistant United States Attorney
Nevada State Bar Number 10233
501 Las Vegas Boulevard South, Suite 1100
Las Vegas, Nevada 89101
(702) 388-6503 / Fax: (702) 388-6418
phillip.smith@usdoj.gov

Attorney for the Plaintiff

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

* * *

UNITED STATES OF AMERICA,)	2:14-cr-138-JAD-VCF
)	
)	
Plaintiff,)	
)	
vs.)	
)	
CHARLES RAY BELL, JR.,)	
)	
Defendant.)	
)	

STIPULATION TO CONTINUE SENTENCING HEARING

IT IS HEREBY STIPULATED AND AGREED, by and between Daniel G. Bogden, United States Attorney, and Phillip N. Smith, Jr., Assistant United States Attorney, counsel for the United States of America, and Russell E. Marsh, Esq., counsel for Defendant CHARLES RAY BELL, JR., that the sentencing hearing for the above-captioned matter, currently scheduled for September 6, 2016, at the hour of 10:00 a.m., be vacated and continued to September 20, 2016, at the hour of 11:00 a.m. The parties also stipulate and agree that the Government's response to the Defendant's Sentencing Memorandum will be due on September 9, 2016. Counsel for the Defendant may file any supplemental points and authorities, if any, no later than September 14, 2016.

1 This stipulation is entered for the following reasons:

2 1. Counsel for the Government needs additional time to respond to arguments
3 contained in the Defendant's Sentencing Memorandum, at least one of which is an issue of first
4 impression before this Court.

5 2. The Defendant is in custody, but he does not object to the continuance.

6 3. Denial of this request for a continuance of the sentencing hearing could
7 potentially prejudice both parties and/or unnecessarily consume resources.

8 4. Additionally, denial of this request for continuance could result in a miscarriage
9 of justice.

10 DATED: August 30, 2016.

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12 /s/
PHILLIP N. SMITH, JR.
13 Assistant United States Attorney
14 Counsel for the United States

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16 /s/
RUSSELL E. MARSH, ESQ.
17 Counsel for Defendant CHARLES BELL
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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

* * *

UNITED STATES OF AMERICA,)	2:14-cr-138-JAD-VCF
)	
)	ORDER CONTINUING
Plaintiff,)	SENTENCING HEARING
)	
vs.)	
)	
CHARLES RAY BELL, JR.,)	
)	
Defendant.)	

ORDER

Based on the pending Stipulation of counsel, and good cause appearing therefore, **IT IS HEREBY ORDERED**, that the sentencing hearing in the above-captioned matter, currently scheduled for September 6, 2016 at the hour of 10:00 a.m., be vacated and continued to September 20, 2016 at the hour of 11:00 a.m.

IT IS FURTHER ORDERED, that the Government shall file a response to the Defendant's Sentencing Memorandum no later than September 9, 2016, and the Defendant shall file any supplemental points and authorities, if any, no later than September 14, 2016.

DATED: 8/30/2016


UNITED STATES DISTRICT JUDGE